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VIA ECF

February 17, 2023

Honorable James R. Cho
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Haddad v. Halabi, U.S.D.C., E.D.N.Y. No. 22-CV-1906

Dear Judge Cho:

This firm represents Defendant Soly Halabi (“**S. Halabi**”) in the above-referenced matter.

Pursuant to the Court’s inherent authority and FED. R. CIV. P. 26(c), and for the reasons set forth in our attached letter of June 29, 2022, Doc. 22, we respectfully move the Court to stay discovery as to S. Halabi, including his compliance with the Order dated February 8, 2023, Doc. 23, until the Court has ruled on S. Halabi’s motion to dismiss, as the burden and costs associated with discovery and his participation therein are unfairly prejudicial to S. Halabi and may be avoided if the Court grants the motion to dismiss.

We certify that we have met and conferred with Plaintiff’s counsel, Maryam Hadden, and have been informed that Plaintiff opposes this request.

We thank Your Honor for your consideration of these important issues.

Respectfully submitted,

/s/ Keith A. Lazere
Keith A. Lazere

cc: Maryam Hadden, Esq. (via ECF)
Morris Fateha, Esq. (via ECF)
Sheldon Eisenberger, Esq.
Neil C. Schur, Esq.